



KENAI PENINSULA BOROUGH

144 N. BINKLEY • SOLDOTNA, ALASKA • 99669-7520
BUSINESS (907) 262-4441 FAX (907) 262-1892

JOHN J. WILLIAMS
MAYOR

May 9, 2006

Ms. Nicole Allison, Project Review Coordinator
Alaska Department of Natural Resources
Office of Project Management and Permitting
550 West 7th Avenue, Suite 1660
Anchorage, Alaska 99501

Subject: Sunset View, Kachemak Bay, AK 0603-07AA

Dear Ms. Allison:

Kenai Peninsula Borough Coastal Management Plan (KPBCMP) staff received a project proposal for review submitted by Sunset View Estates, LLC to the Alaska Coastal Management Program (ACMP) seeking a consistency determination for construction activity in wetlands in Homer, Alaska. Based on our review of the project, we offer the following comments.

Project Description

The project developer seeks to excavate 18,839 cubic yards of soils and import sand and gravel into approximately 1.75 acres of wetlands to construct 48 single-family homes with a like number of driveways, import approximately 8,000 cubic yards of material into 1.83 acres of wetlands for residential streets and excavate an additional .97 acres of wetlands for the installation of sewer, water, telephone, video and electric lines.

Project Discussion

The subject of this review is part of a larger development known as Foothills Subdivision Sunset View Estates Addition No. 2 and is a 41.57-acre development of which 9.9 acres on the southern end have been identified as wetlands. Within this development there are several streams that drain into wetlands, flow down a steep slope onto Kenai Peninsula Borough school property and into a drainage pipe that transports the run-off beneath the school property to a discharge point further south. The run-off travels via under ground pipe and open ditch into Kachemak Bay at a point that provides clear evidence of persistent erosion.

The developer has calculated the additional run-off created as a result of the removal of vegetation and hardening surfaces using as the basis of calculations a 10-year 3-hour storm event.

As a means to maintain the current rate of water discharge from the subdivision, the developer proposes to create 330 cubic foot capacity water retention ponds on each property in the wetland area and develop an 11,848 cubic foot capacity community retention pond within the subdivision.

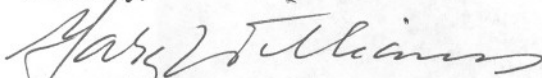
Finding

Kenai Peninsula Borough Coastal Zone Management Program (KPBCZMP) enforceable policy 2.4, Dredging and Filling, and 2.5, Disposal of Dredged Material, the KPCZMP requires that dredging and filling in wetlands shall limit the area of disturbance to as small an area as possible; minimize sediment flowing away from the dredge site and maintain the circulation and drainage patterns in the area of the fill. Inasmuch as the developer has not detailed a plan to prevent dredging and filling activity from eroding onto adjacent land, as an alternative measure an erosion and sediment control plan based on Best Management Practices should be required as a condition of a permit to excavate.

KPBZMP enforceable policy 2.7, Cumulative Impacts, requires that proposed new and existing development consider the cumulative effects of such activity on ambient air and water quality and coastal habitats. The developer has utilized a modest 10-year, 3-hour storm event to calculate the amount of water retention area required to maintain the current rate of discharge from the project. As an alternative measure the developer should recalculate using more conservative 10-year 6-hour storm event. This alternative measure will provide hydrologists with a more complete picture of the potential cumulative impact of the water run-off that must be contained when compared with the 10-year, 3-hour storm event. As an advisory to this alternative measure, the KPBCZMP recommends that the developer share storm data and plans for development of the proposed large containment pond with Rob Robson, P.E., Kenai Peninsula Borough, at 262-2030 and Carey Meyer, P.E., City of Homer, at 235-3170.

Thank you for the opportunity to comment.

Sincerely,



Gary Williams
Coastal Management Program Coordinator

Copy: Rob Robson, Kenai Peninsula Borough
Cary Meyer, City of Homer